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DIGEST OF OTHER RECENT VIRGINIA DECISIONS.**Supreme Court of Appeals.**

Note.—In this department we give the syllabus of every case decided by the Virginia Supreme Court of Appeals, except of such cases as are reported in full.

ARMSTEAD v. COMMONWEALTH.

March 28, 1912.

[74 S. E. 399.]

Intoxicating Liquors (§ 138*)—Shipment—"Local Option Territory"—"No-License Territory."—Under Acts 1910, c. 190, § 30, requiring shipments of ardent spirits into local option or no-license territory to be plainly marked, showing the kind and quantity of spirits and the consignee of the package, and section 19c, defining "local option territory" as territory which, by vote under the local option law, has declared against the issuance of licenses for the sale of ardent spirits, and "no-license territory" as territory in which, under the provisions of that or some other act, no license for the sale of such spirits can be granted, a conviction cannot be sustained for failure to mark as specified a shipment into a magisterial district, where licenses may be issued under certain conditions, and which voted against local option at the last option election, although no licenses are actually in effect.

[Ed. Note.—For other cases, see *Intoxicating Liquors*, Cent. Dig. § 148; Dec. Dig. § 138.* 8 Va.-W. Va. Enc. Dig. 14.]

Error to Circuit Court, Orange County.

Howard Armstead was convicted of crime, and he brings error. Reversed, and prosecution dismissed.

R. V. Shackelford, for plaintiff in error.

The Attorney General, for the Commonwealth.

UNITED STATES LEATHER CO. v. SHOWALTER.

March 28, 1912.

[74 S. E. 400.]

1. Master and Servant (§ 276*)—Injuries—Sufficiency of Evidence.—Evidence, in an employee's action for personal injuries while operating a wringing machine in a tannery, held to sustain a verdict for plaintiff.

[Ed. Note.—For other cases, see *Master and Servant*, Cent. Dig. §§ 950-952, 954, 959, 970, 976; Dec. Dig. § 276.* 9 Va.-W. Va. Enc. Dig. 725.]

*For other cases see same topic and section NUMBER in Dec. Dig. & Am. Dig. Key No. Series & Rep'r Indexes.